

**REMARKS**

The Final Office Action mailed October 28, 2004, has been received and reviewed. Claims 1 through 31 and 51 through 66 are currently pending in the application. Claims 1 through 16 stand rejected. Claims 17 through 31 and 51 through 66 have been allowed. Applicant proposes to amend claim 1, and respectfully requests reconsideration of the application as proposed to be amended herein.

**35 U.S.C. § 102(b) Anticipation Rejections****Anticipation Rejection Based on U.S. Patent No. 5,286,426 to Rano, Jr. et al.**

Claims 1, 2, 4 and 5 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Rano, Jr. et al. (U.S. Patent No. 5,286,426). Applicant respectfully traverses this rejection, as hereinafter set forth.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Rano discloses a method for assembling a lead frame between two plate-mold cavity plates. An encapsulating plastic body is formed about each chip 12. This is accomplished by sandwiching the lead frame strip between two cavity plates 20 and 22 as shown in FIG. 2, having cavities that surround each integrated circuit chip 12 including portions of the lead frame fingers 16. Lead frame strip regions lying outside the perimeter of the mold cavities 24 will, in the completed mold assembly, be contacted by the flat mating portions of the bottom and top cavity plates 20 and 22. Col. 2, lines 37-52. A pair of short guide pins 50 extends upwardly from the bottom cavity plate 20 for registration with two pilot holes 18 of the lead frame strip 10. Col. 3 lines 9-12. Cavities, 24, are spaced at intervals in a row in the bottom cavity plate 20. Col. 2 lines 63-64. The assembly fixture also has a base plate 36 with two upwardly extending guide posts 38 and 40. The guide posts 38 and 40 extend through two holes 42 and 44 in the bottom cavity plate 20. Col 3 lines 1-6. The top cavity plate also has guide holes 66 that will be penetrated by guide posts 38 and 40. Col 3 lines 67-68.

Claim 1, as proposed to be amended herein, recites an “apparatus for facilitating processing of a plurality electronic component assemblies, comprising: a first platen including a plurality of sets of *alignment elements projecting from a like plurality of shallow recesses in a surface of the first platen*, the like plurality of shallow recesses configured to receive a like plurality of electronic component assemblies, and the plurality of sets of alignment elements configured and positioned for cooperatively engaging sets of alignment features of the like plurality of electronic component assemblies arranged in a plurality of mutually laterally spaced locations over the first platen.” (emphasis added)

Rano fails to disclose a first platen including a plurality of sets of alignment elements projecting from a like plurality of shallow recesses in a surface of the first platen. Rather, Rano discloses a base plate 36 with two upwardly extending guide posts 38 and 40 which extend through two holes 42 and 44 in the bottom cavity plate 20. The top cavity plate also has guide holes 66 that will be penetrated by guide posts 38 and 40. Spaced apart from lead frame strip regions, guide posts 38 and 40 are not configured to engage lead frame strip 10, and do not project from shallow recesses for receiving lead frame strips. (See FIG. 2) The lead frame strips of Rano are contacted by the flat mating portions of the bottom and top cavity plates 20 and 22, not received by shallow recesses in the bottom cavity plate. Accordingly, Rano fails to describe each and every element of claim 1 as proposed to be amended herein. Therefore, it is respectfully submitted that the rejection to claim 1 should be withdrawn.

Claims 2, 4, and 5 are each allowable, among other reasons, as depending from claim 1 which should be allowed.

Claims 4 and 5 are additionally allowable because Rano fails to disclose component cavities divided into a plurality of subcavities separated by strut members. The cavities of Rano surround *each integrated circuit chip 12 including portions of the lead frame fingers 16*. The perimeter of the cavities about each lead frame strip is indicated in FIG. 1 as a dashed line 24. FIG. 1 does not show an inherent teaching by Rano of subcavities, rather FIG. 1 shows that a non-divided cavity surrounds each integrated circuit chip to form an encapsulating plastic body about each chip 12.

### 35 U.S.C. § 103(a) Obviousness Rejections

Obviousness Rejection Based on U.S. Patent No. 5,286,426 to Rano, Jr. et al. as applied to claim 1, and further in view of U.S. Patent 5,985,185 to Steijer et al.

Claims 3 and 6 through 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rano, Jr. et al. (U.S. Patent No. 5,286,426) as applied to claim 1 and further in view of Steijer et al. (U.S. Patent No. 5,985,185). Applicant respectfully traverses this rejection, as hereinafter set forth.

M.P.E.P. 706.02(j) sets forth the standard for a Section 103(a) rejection:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (Emphasis added).

The 35 U.S.C. § 103(a) obviousness rejections of claims 3 and 6-16 are improper because they fail to establish a *prima facie* case of obviousness.

The teachings of Rano have been summarized above.

Steijer et al. is directed to encapsulating optocomponents with a capsule of plastic or resin material using a mould assembly. As described, the mould assembly comprises a lower mould half 1 having a mould cavity 3 and an upper mould half 17 having a mould cavity 19 (Figs. 1 and 2). The mould assembly is configured to receive a lead frame 51, which rests on shoulders 71 of mould cavity 3 (col. 6, lines 3-16). Lower mould half 1 further includes fixed guide pins 73 that are placed in holes 75 of lead frame 51 in order to keep lead frame 51 in its correct position in mould cavity 3. Both lower mould half 1 and upper mould half 17 include positioning pins 85 and corresponding holes 87 for receiving positioning pins 85, the function of which is to place the two mould halves 1 and 17 in mutually correct positions during the moulding process (Figs. 1 and 2 and col. 7, lines 57-61).

It is respectfully submitted that Rano and Steijer, taken either alone or in combination, do

not teach or suggest each and every element of independent claim 1, as proposed to be amended herein, from which claims 3 and 6 through 16 depend. Claims 3 and 6 through 16 are each therefore allowable, among other reasons, as depending from claim 1 which should be allowed.

As set forth above, Applicants submit that Rano fails to teach or suggest all the limitations as set forth in independent claim 1, as proposed to be amended herein. Steijer fails to cure the deficiencies of Rano. Steijer fails to teach or suggest a first platen including a plurality of sets of alignment elements projecting from a like plurality of shallow recesses in a surface of the first platen, the like plurality of shallow recesses configured to receive a like plurality of electronic component assemblies, the plurality of sets of alignment elements configured and positioned for cooperatively engaging sets of alignment features of the like plurality of electronic component assemblies, and a second platen including a plurality of component cavities extending therethrough, the second platen further including a plurality of sets of alignment element receptacles configured and positioned to respectively receive therein the plurality of sets of alignment elements as set forth in claim 1 of the present invention. Rather, Steijer teaches a lower mould half 1 including fixed guide pins 73 that are placed in holes 75 of lead frame 51. Fixed guide pins 73 are not received by the upper mould half 17. Lower mould half 1 and upper mould half 17 include positioning pins 85 and corresponding holes 87 for receiving positioning pins 85, however, positioning pins 85 and corresponding holes 87 are not configured for engaging alignment features of lead frame 51. Positioning pins 85 do not project from a shallow recess, rather are located outside the lead frame region of mould cavity 3. (See FIG.1) Accordingly, Steijer fails to cure the deficiencies in Rano. Therefore, it is respectfully submitted that claim 1, as proposed to be amended herein, is allowable over the combination of Rano and Steijer because the cited prior art fails to establish a *prima facie* case of obviousness because the cited prior art does not teach or suggest the claim limitations of the claimed invention of claim 1.

Claims 3 and 6 through 16 are each allowable, among other reasons, as depending from claim 1 which should be allowed.

Claims 6, 8, 10-12, and 14 are each further allowable because neither Rano nor Steijer teach or suggest a component cavity divided into a plurality of subcavities separated by strut members. It is respectfully submitted that there is no suggestion or motivation either in the references themselves or in the knowledge generally available to one of ordinary skill in the art,

to modify either reference. Rano teaches forming an encapsulating plastic body about each chip, a cavity surrounding each chip. There is no motivation to subdivide a cavity because a single chip is surrounded by the cavity. Steijer teaches encapsulating an optocomponent. Again, there is no motivation to subdivide the mold cavity of Steijer because there is only one optocomponent to be encapsulated in the mold cavity.

### **ENTRY OF AMENDMENTS**

The proposed amendments to claim 1 above should be entered by the Examiner because the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application. Finally, if the Examiner determines that the amendments do not place the application in condition for allowance, entry is respectfully requested upon filing of a Notice of Appeal herein.

### **CONCLUSION**

Claims 1 through 31 and 51 through 66 are believed to be in condition for allowance, and an early notice thereof is respectfully solicited. Should the Examiner determine that additional issues remain which might be resolved by a telephone conference, he is respectfully invited to contact Applicant's undersigned attorney.

Respectfully submitted,



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